

IN THE UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL  
CORP., Plaintiff,

v.

BOLIVARIAN REPUBLIC OF  
VENEZUELA,  
Defendant.

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No. 1:17-mc-00151-LPS

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DISTRICT OF DELAWARE  
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**SUPPLEMENTAL BRIEF IN SUPPORT OF NOTICE OF APPEAL AND  
MOTION FOR STAY PENDING APPEAL**

**August 5, 2025**

Pro se movant Dr. Leroy A. Garrett, American Citizen, on behalf of 23,000 victims of Venezuela's petroleum Holocaust, respectfully submits this supplemental brief to the appeal/stay motion (filed August 5, 2025) from D.I. 1961 (July 31, 2025 denial), highlighting new evidence to avert manifest injustice.

**I. NEW EVIDENCE OF SALE FLAWS**

Gramercy's response (D.I. 1968, August 4, 2025) to the 2020 Bondholders' objection (D.I. 1943) reveals overreach in the Special Master's Proposed Order (D.I. 1837, Ex. A), potentially barring creditor claims against PDVH/CITGO assets, not just shares (Dole Foods Co. v. Patrickson, 538 U.S. 468 (2003)). This aligns with Movant's witness motion (filed July 31, 2025) for Medina, Wilhelm, and Jorda, and investigation motion (D.I. 1929), exposing PDVSA Ad Hoc perjury (D.I. 1802) and Special Master secrecy (D.I. 1951 redactions, unanswered questionnaires D.I. 1746/1791). Gramercy's proposed carveout supports victim claims against PDVH assets, reinforcing FSIA status (Simon v. Republic of Hungary, 911 F.3d 1172 (D.C. Cir. 2018)).

## II. REINFORCED INJUSTICE AND CORRUPTION

The U.S. Treasury's July 25, 2025 Cartel de los Soles SDGT designation (Maduro-led terrorism) ties to PDVSA corruption (2019 sanctions, El Mundo 2025 bribes), amplifying Medina's bad faith inaction despite union ties. Ignored depositions under oath and Petroamigos statements violate *Tabron v. Grace*, 6 F.3d 147 (3d Cir. 1993), and due process (*Haines v. Kerner*, 404 U.S. 519 (1972)). Human rights violations lack limitations (*Velásquez Rodríguez v. Honduras*, Inter-Am. Ct. H.R. (1988)).

## III. REQUEST FOR STAY

Renew stay request (*Nken v. Holder*, 556 U.S. 418 (2009)) to prevent mootness (*Already, LLC v. Nike, Inc.*, 568 U.S. 85 (2013)), as sale (D.I. 1837-1) buries victims' recovery. Equities favor justice.

Respectfully,



Dr. Leroy A. Garrett  
Interested Party with Entry of Appearance  
Pro Se Attorney  
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